

December 4, 2002

Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

RE: RM-10077, Modification of Section 90.20 © of the Commissions Rules to Permit Use of Any Certified Public Safety Frequency Coordinator for Channels below 470 MHz.

Gentlemen:

I highly recommend the Commission act favorably on this NPRM.

The following is a personal viewpoint from 55 years of experience in the 2-way radio industry and 15 years as an APCO-AFC Local Advisor for the States of Washington and Alaska.

Having all frequencies below 470 MHz available to coordinating agencies will, in my opinion, reduce the “warehousing” of frequencies that is common today. Washington State, as an example, has 84 of the possible 86 channels allocated to Forestry Conservation, FO, licensed to the Department of Natural Resources. Any attempt by another frequency coordinating agency to license on any of the FO channels are challenged by the FCCA with the justification “severe interference will result.” There are parts of Washington State that have no forest to protect, or is separated well over the distance required for either co-channel or adjacent channel guidelines. The most recent absurd objection by the FCCA, whose justification was, “this channel is expected to be used some time in the near future.” The Commission agreed with this statement resulting in the application being denied. Actions like this from the Commission certainly confuse coordinating agencies when opinions are made that defy common logic or coordination standards accepted by the Commission.

APCO relies on local advisors who live in or are intimately knowledgeable of the terrain with experience making the correct judgment in frequency assignments or interference judgments. Coordinators from the Eastern part of the US have little experience in the applicant’s needs or territory for the Western US and therefore make severe errors in either assignments or denials.

Another example is the local frequency advisors know which agency is holding on to frequencies that have been abandoned by moving to 800 MHz. Coordinating agencies without representation in the local area are unaware of the warehousing which leads to ongoing licensing. It is in the best interest of the Commission that these frequencies are made available to other qualified applicants, and not kept in “reserve” by one coordinating agency for its own interest.

Coordination is based on established engineering criteria, information sharing, computer modeling, experience and common sense of the local area and its effects on propagation. Not one coordinating agency has a monopoly on these principles. Coordination was open to competition by the Commission, Docket No. 02-285 RM-10077, II, 5. Now it's time the Commission open the spectrum to equal competition by the same argument.

Respectfully
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